

Northern

UNITED STATES DISTRICT COURT

District of California

FILED

JUN - 7 2017

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

UNITED STATES OF AMERICA,)
Plaintiff)
vs.)
Google Inc [Name of)
defendant],)
Defendant)

No. _____

COMPLAINT

Plaintiff alleges:

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MEJ

(PR)

JURISDICTION

1. This action is brought on behalf of the United States to enforce the provisions of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq.

2. This Court has subject matter jurisdiction of the action under 42 U.S.C. § 2000e-5(f) and 28 U.S.C. § 1345.

CLAIM FOR RELIEF

3. The defendant City of Mountain View, CA. 94043 is a corporate,
governmental body created pursuant to the laws of the State of
California.

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4. The defendant is a "person" within the meaning of 42 U.S.C. § 2000e(a) and an "employer" within the meaning of 42 U.S.C. § 2000e(b).

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5. The defendant has subjected Manuel Alvarez Cabello Ramirez [name of complainant] to discrimination on the basis of his [his or her] national origin, Mexican-American, in violation of 42 U.S.C. § 2000e-2(a)

6. Defendant accomplished this discrimination, among other ways, by:

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Ramirez
a. Failing or refusing to hire or promote Manuel Alvarez Cabello Ramirez [name of complainant] to the position of Software Tech. [job title denied, e.g., Sanitation Department Superintendent] and to pay him [him or her] accordingly; and

b. Failing or refusing to take appropriate action to remedy the effects of the discriminatory treatment of Manuel Alvarez Cabello Ramirez [name of complainant].
(*Juan 27ram@gmail.com*)
Ramirez

7. Manuel Alvarez Cabello Ramirez [Name of complainant] timely filed charges of discrimination with Equal Employment Opportunity Commission alleging that he [he or she] had been discriminated against on the basis of his [his or her] national origin by the City when he [he or she] was denied a promotion.

8. The EEOC investigated the charges pursuant to 42 U.S.C. § 2000e-5.

a. It found reasonable cause to believe that the allegations of discrimination were true;

b. It attempted unsuccessfully to achieve a voluntary resolution of these matters through conciliation; and

- c. After unsuccessful attempts to find a voluntary resolution; it referred the charge to the U.S. Department of Justice.

9. All conditions precedent to the filing of suit have been performed or have occurred.

PRAYER

The plaintiff requests this Court to:

A. Enter an order enjoining the defendant from failing or refusing to provide remedial relief sufficient to make whole the charging party, Manuel Alvarez Cabello R. [name of complainant], for the individual loss he [he or she] has suffered as a result of the discrimination against him [him or her] as alleged in this **Complaint**

(Juan27ram@gmail.com)
B. Award compensatory damages to Manuel Alvarez Cabello Ramirez [name of complainant] sufficient to fully compensate him [him or her] for injuries caused by the City's discriminatory conduct, pursuant to and within the statutory limitations of 42 U.S.C. § 1981a.

C. Enter an order enjoining the defendant to take other appropriate nondiscriminatory measures to overcome the effects of the discrimination.

D. Award plaintiff its costs of suit.

E. Grant plaintiff all other relief that justice may require.

Dated: 05/30/2017

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